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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

RACHEL G. DAMIANO and KATIE S.
MEDART,

Plaintiffs,

v.

GRANTS PASS SCHOOL DISTRICT 7, an
Oregon public body; THE MEMBERS OF THE
BOARD OF EDUCATION OF GRANTS PASS
SCHOOL DISTRICT 7 – Scott Nelson, Cliff
Kuhlman, Gary Richardson, Debbie Brownell,
Cassie Wilkins, Brian Delagrang, and Casey
Durbin – in their official and personal capacities;
KIRK T. KOLB, Superintendent, Grants Pass
School District 7, in his official and personal
capacity; and THOMAS M. BLANCHARD,
Principal, North Middle School, Grants Pass
School District y, in his official and personal
capacity,

Defendants.

Case No. 1:21-cv-00859-CL

DECLARATION OF KAREN M.
VICKERS IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

I, KAREN M. VICKERS, declare:

1. I am one of the attorneys of defendants Grants Pass School District No. 7, Kirk Kolb, Thomas M. Blanchard, Scott Nelson, Debbie Brownell, and Brian De La Grange. I make this declaration based on personal knowledge and am competent to testify as to the matters stated

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herein.

2. Attached hereto as Exhibit 1 is an excerpt and exhibits from the deposition of plaintiff Rachel Sager provided to me by certified court reporters Veritext.

3. Attached hereto as Exhibit 2 is an excerpt and exhibits from the deposition of plaintiff Katie Medart provided to me by certified court reporters Veritext.

4. Attached hereto as Exhibit 3 is a copy of an excerpt of an interview of Rachel Damiano. This document was produced to me by plaintiffs in response to defendants' request for production.

5. Attached hereto as Exhibit 4 is a copy of an excerpt of an interview of Katie Medart. This document was produced by plaintiffs in response to defendants' request for production.

6. Attached hereto as Exhibit 5 is an excerpt and exhibits from the deposition of Kirk Kolb provided by certified court reporters Naegeli.

7. Attached hereto as Exhibit 6 is an excerpt and exhibits from the deposition of Sherryl Ely provided to me by certified court reporters Naegeli.

8. Attached hereto as Exhibit 7 is an excerpt and exhibits from the deposition of Tanika Cooks provided to me by certified court reporters Naegeli.

9. Attached hereto as Exhibit 8 is a redacted copy of an Investigation Report. This document was produced by defendants in response to plaintiffs' request for production.

8. Attached hereto as Exhibit 8 is a redacted copy of an Investigation Report. This document was produced by defendants in response to plaintiffs' request for production.

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I hereby declare that the above statement is true to the best of my knowledge and belief,
and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: August 1, 2022.

VICKERS PLASS LLC

s/ Karen M. Vickers
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